

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ELISABETH DOHERTY

Plaintiff,

v.

AMERICAN INTERNATIONAL
COLLEGE,

Defendant.

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CIVIL ACTION NO. 1:17-CV-10161

**JOINT STATEMENT SUBMITTED PURSUANT
TO FED. R. CIV. P. 26(f) AND LOCAL RULE 16.1**

Elisabeth Doherty (the “Plaintiff”) and American International College (the “Defendant”) submit the following joint statement in accordance with Fed. R. Civ. P. 26(f) and Local Rule 16.1. Pursuant to the Court’s Notice of Scheduling Conference, Plaintiff and Defendant submit the following joint statement:

A. Discovery and Motion Schedule, including Expert Discovery.

The parties agree to conform to the discovery limitations set forth in Fed. R. Civ. P. 26(b). In addition, the parties agree to the following discovery and motion schedule:

1. Initial Disclosures. Initial disclosures required by Fed. R. Civ. P. 26(a)(1) must be completed by **July 12, 2017**.

2. Electronic Discovery. The parties do not anticipate that ESI subject to discovery will be voluminous. Based on that understanding, and unless otherwise requested, the parties agree that ESI subject to discovery shall be disclosed and produced in paper format that shall include attachments to E-mails and other documents. The parties further agree that they will

preserve all ESI (as it is ordinarily maintained) that is within the scope of discovery within the meaning of Rule 26, including but not limited to e-mails, instant messages, voice mail messages, personal digital assistant data, metadata, calendars, and electronically stored files and documents of any kind, including drafts, pending the conclusion of this action.

3. Amendments to Pleadings. Except for good cause shown, no motions seeking leave to add new parties or to amend the pleadings to assert new claims or defenses may be filed after **September 8, 2017**.

4. Fact Discovery - Interim Deadlines.

a. All requests for production of documents and interrogatories must be served so that the responses thereto will be due no later than **February 12, 2018**.

b. All requests for admission must be served so that the responses thereto will be due no later than **February 12, 2018**.

c. All depositions, other than expert depositions, must be completed by **February 12, 2018**.

5. Fact Discovery - Final Deadline. All discovery, other than expert discovery, must be completed by **February 12, 2018**.

6. Status Conference. A status conference will be held as the Court may schedule at its convenience.

7. Expert Discovery.

- a.** Plaintiff's trial experts must be designated, and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed, by **April 12, 2018**.
- b.** Plaintiff's trial experts must be deposed by **June 12, 2018**.
- c.** Defendant's trial experts must be designated, and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed, by **May 14, 2018**.
- d.** Defendant's trial experts must be deposed by **July 13, 2018**.

8. Dispositive Motions.

- a.** Dispositive motions, such as motions for summary judgment or partial summary judgment and motions for judgment on the pleadings, must be filed by **May 14, 2018**.

9. Initial Pretrial Conference. An initial pretrial conference will be held at such other time as the Court may schedule in its convenience. The parties shall prepare and submit a pretrial memorandum in accordance with Local Rule 16.5(D) five business days prior to the date of the conference, except that the parties need not include matters required by Local Rule 16.5(D)(2) or (3).

10. Modification of Schedule. All dates set forth herein may be modified by written agreement of the parties and approval of the Court, or upon motion of the Court for good cause shown.

B. Magistrate. The parties are not yet prepared to consent to trial before a United States Magistrate Judge, but will continue to consider that possibility.

C. Certifications. The required certifications are attached or will be filed separately.

III. CERTIFICATION

Pursuant to Local Rule 16.1(D) (3), certifications signed by the parties and their counsel have been submitted affirming that each party and each party's counsel have conferred with a view to establishing a budget for the costs of conducting the full course and alternatives to the litigation and to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

Respectfully Submitted,
The Plaintiff,
By Her Attorneys,

Respectfully submitted,
The Defendant
By its Attorneys,

/s/ Danielle C. White
David P. Angueira BBO# 019610
Danielle C. White BBO#692437
Swartz & Swartz, P.C.
10 Marshall Street
Boston, MA 02108
(617) 742-1900
dangueira@swartzlaw.com
dwhite@swartzlaw.com

/s/ Ariel G. Sullivan
Ariel G. Sullivan BBO #673343
BOWDITCH & DEWEY, LLP
175 Crossing Blvd, Suite 500
Framingham, MA 01702
(508) 926-3189
asullivan@bowditch.com

Dated: June 13, 2017

CERTIFICATE OF SERVICE

The undersigned understands that the following counsel of record is registered on the court's CM/ECF database. Pursuant to Local Rules 5.2 and 5.4, counsel for the Plaintiff hereby certifies that this individual (1) will receive from the court electronic notification of the filing of the foregoing Joint Statement Submitted Pursuant to Fed. R. Civ. P. 26(f) and Local Rule 16.1, filed via ECF on June 13, 2017; (2) have access to this document through the court's website; and (3) will not receive paper copies of the foregoing from the undersigned upon filing:

Ariel G. Sullivan BBO #673343
BOWDITCH & DEWEY, LLP
175 Crossing Blvd, Suite 500
Framingham, MA 01702
(508) 926-3189

Dated: June 13, 2017

/s/ Danielle C. White
Danielle C. White